

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In re:	)	
ANDREA HOWELL,	)	CASE NO.: 19-45665-399
	)	
	)	Chapter 13
Debtor.	)	
	)	Response Due: 10/07/2021

**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS  
FOR FAILURE TO MAKE PLAN PAYMENTS AND NOTICE**

COMES NOW Debtor, by and through her attorney, and for her Answer to Trustee's Motion to Dismiss for Failure to Make Plan Payments, states as follow:

1. Debtor admits the allegations of Paragraph 1.
2. Debtor admits the allegations of Paragraph 2.
3. Debtor denies the allegations of Paragraph 3.
4. Debtor denies the allegations of Paragraph 4.
5. Debtor denies the allegations of Paragraph 5.

WHEREFORE, Debtor requests the Court to deny the motion, set it for hearing, and to make any other orders which the Court may find to be just.

Respectfully submitted,

Timothy P. Powderly

/s/ Timothy P. Powderly  
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ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served upon the following electronically through the CM/ECF system of the court on September 17, 2021 to:

Diana S. Daugherty  
standing\_trustee@ch13stl.com, trust33@ch13stl.com

/s/ Timothy P. Powderly  
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